



WASHINGTON STATE DEPARTMENT OF
Natural Resources

JENNIFER M. BELCHER
Commissioner of Public Lands

March 31, 2000

Lonnie Mettler, lead planner
Department of the Army
Walla Walla District, Corps of Engineers
201 North Third Avenue
Walla Walla, WA 99362-1876

ATTN: Lower Snake River Study

Dear Lonnie:

Thank you for the opportunity to comment on the Draft Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement (DEIS). The DEIS identifies 4 possible courses of action for improving salmon passage through 4 dams within a 140 mile stretch of the lower Snake River which are operated by the U.S. Army Corps of Engineers.

As manager of state owned lands, particularly aquatic lands, the Washington Department of Natural Resources (DNR) has a vested interest in the outcome of this proposal. DNR currently manages approximately 2.4 million acres of navigable waters of the state, as defined by the Revised Code of Washington (RCW 79), which include shorelands and beds of navigable waters. Additionally, DNR manages approximately 3 million acres of uplands including approximately a million acres of agricultural and grazing lands. Each of these lands, aquatic, forested and agricultural lands are held in public trust by the state and managed by DNR for the people of the state.

DNR appreciates the effort that it took to pull together a document of this magnitude. There are however, a few areas where additional information should be provided. In general, the department found that there is not enough information provided in the DEIS to adequately determine whether or not state owned lands are likely to be impacted. Also, the DEIS lacks a discussion of the impacts that each of the proposed alternatives is likely to have to adjacent land uses, including agriculture.

Attached please find our specific comments. We appreciate the opportunity to comment on this proposal. If you have any questions concerning our comments, please feel free to contact Dave Dietzman at (360) 902-1633.

Sincerely,

Kaleen Cottingham
Deputy Commissioner of Public Lands

cc. Bill Vogel, United States Fish and Wildlife Service
Steve Landino, National Marine Fisheries Service
US Army Corp of Engineers
US Environmental Protection Agency
Rebecca Inman, Department of Ecology
Bill Tweit, Governmental Policy, Department of Fish and Wildlife

Attachment

DNR's specific comments regarding the Draft Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement (DEIS) are as follows:

Aquatic Lands:

- The DNR requests that the final EIS discuss ownership of the beds of navigable waters in the areas associated with the dams. There currently is not enough information provided in the DEIS to determine ownership.
- The DEIS states that the Corps will need to acquire state owned parcels adjacent to the proposal sites. From the maps provided, it is unclear which lands this will involve. DNR will need to see detailed plat maps of any adjacent DNR managed uplands that the Corps will need to acquire.
- The final EIS should include in the discussion for alternative 4, what the status of the river bed will be after breaching of the dams. For instance, which parts of the river are expected to revert back to natural status? This discussion should also describe which, if any, areas the Corps expects to revert back to DNR management.
- The final EIS needs to describe any right-of-way use authorizations that have been granted by the Corps in the past and how those easements will be affected by each of the alternatives. It should include details such as who are the easements granted to and for what purpose, the agreed upon life of the easement, and whether it is expected that the management of these agreements will change under any of the proposed alternatives.
- The FEIS needs to include information regarding sediments, including their composition and any contaminants that may be present. This should include a discussion of the likelihood of those sediments being transported downstream with any of the alternatives, but especially with alternative 4. The final EIS should include a summary of any testing data and/or sediment transport information that is currently available.

Agricultural Lands:

- The Final EIS should include a plan, approved by local noxious weed control boards, which describes how any disturbed soils, or exposed soils from drawdown, will be protected from invasive weeds. This plan should also describe what the desired future condition in the area is. This should include compliance with any requirements by local noxious weed boards, however DNR suggests a more pro-active approach which includes treatment of the area to discourage noxious weed or invasive species from becoming established in the area. Specifically, the noxious weed plan should include a schedule for planting of native species. A monitoring plan should also be included which will indicate if seedlings have become established or if additional plantings are necessary.